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FILED

DISTRICT COURT OF GUAM

JUL 25 2007

MARY L.M. MORAN

CLERK OF COURT

Attorneys for the United States of America

IN THE UNITED STATES DISTRICT COURT

FOR THE TERRITORY OF GUAM

UNITED STATES OF AMERICA,) CRIMINAL CASE NO. 07-00062

Plaintiff,

INDICTMENT

vs.

THEFT OF GOVERNMENT PROPERTY

[18 U.S.C. § 641] (Count I)

DESTRUCTION OF VETERANS' MEMORIALS

[18 U.S.C. § 1369] (Count II)

JOSEPH U.R.M. ELIBOSANG,

CRIMINAL CONSPIRACY TO TRANSPORT

STOLEN GOODS IN FOREIGN COMMERCE

Defendant.

[18 U.S.C. § 2314] (Count III)

THE GRAND JURY CHARGES:

COUNT I - THEFT OF GOVERNMENT PROPERTY

On or about July 2, 2007, in the District of Guam, the defendant herein, JOSEPH U.R.M. ELIBOSANG, did unlawfully and knowingly steal, purloin and convert to his use or the use of another, and did without authority sell, convey and dispose of, a thing of value belonging to the

1 United States and a department and agency thereof, to-wit: metal plaques, the property of the
2 U.S. National Park Service, said metal plaques having a value of more than \$1,000, in violation
3 of Title 18, United States Code, Section 641.
4

5 COUNT II - DESTRUCTION OF VETERANS' MEMORIALS

6 On or about July 2, 2007, in the District of Guam, the defendant herein, JOSEPH U.R.M.
7 ELIBOSANG, did unlawfully and willfully injure and destroy plaques and monuments on public
8 property commemorating the service of persons in the armed forces of the United States, said
9 plaques and monuments being located on property owned by, or under the jurisdiction of, the
10 Federal Government, to-wit: the Asan Overlook of the War in the Pacific National Park, in
11 violation of Title 18, United States Code, Section 1369.
12

13 COUNT III - CONSPIRACY TO TRANSPORT STOLEN GOODS
14 IN FOREIGN COMMERCE

15 On or about July 2, 2007, within the District of Guam and elsewhere, the defendant
16 herein, JOSEPH U.R.M. ELIBOSANG, did unlawfully, willfully, and knowingly combine,
17 conspire, confederate and agree with other persons both known and unknown to the Grand Jury,
18 to commit an offense against the United States, to-wit: transportation of stolen goods in interstate
19 or foreign commerce, in violation of Title 18, United States Code, Section 2314, and did commit
20 an overt act in furtherance of said conspiracy and to achieve the object thereof, to-wit: by selling
21

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23 //

24 //

25 //

26 //

1 plaques stolen from the Asan Overlook of the War in the Pacific National Park to employees of
2 Xiong's Family Recycling, in violation of Title 18, United States Code, Section 371.

3 Dated this 25th day of July 2007.

4
5 A TRUE BILL.

6
7
8
9 Foreperson

10 LEONARDO M. RAPADAS
11 United States Attorney
12 Districts of Guam and NMI

13 By:

14 Karon V. Johnson
KARON V. JOHNSON
Assistant U.S. Attorney

15 Reviewed:

16
17 By:

18 Jeffrey J. Strand
JEFFREY J. STRAND
First Assistant U.S. Attorney